

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**MOJO NICHOLS, SUSAN BREWSTER,
DUANE DEA, MARYANNE DERACLEO,
KAREN KELLY, REBECCA RICHARDS,
JENNIFER SELLERS, and STACY
SPENCER,**

*Individually and on Behalf of All Others
Similarly Situated,*

Plaintiffs,

v.

**NOOM, INC., ARTEM PETAKOV, and
JOHN DOES 1 TO 5,**

Defendants.

No. 20 Civ. 3677 (LGS) (KHP)

**NOTICE OF PLAINTIFFS' MOTION TO
MODIFY THE STIPULATED PROTECTIVE ORDER**

PLEASE TAKE NOTICE that pursuant Federal Rule of Civil Procedure 26(c), this Court's inherent power, and the Court's February 5, 2021 Discovery Order (ECF No. 195) on a date and time to be designated by the Court, before the Honorable Katharine H. Parker, United States Magistrate Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, Plaintiffs will and hereby do move this Court for an Order modifying the Parties' Stipulation and Protective Order, ECF No. 58, to allow the parties to use Confidential Information disclosed in this action in connection with any other action commenced by a party that involves the same or similar transactions or occurrences that gave rise to the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiffs rely on the accompanying Memorandum of Law. A proposed Order will follow.

Dated: February 12, 2021

Respectfully submitted,

WITTELS MCINTURFF PALIKOVIC

By: /s/ Steven L. Wittels
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Tiasha Palikovic (TP-5697)
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